

EXHIBIT F

Sim, Charlie

From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Friday, August 2, 2024 9:50 AM
To: Sim, Charlie
Cc: Isaacs, Cameron Fredriksen; Marc Fenster; Kristopher Davis; headwater@raklaw.com; ***
GDCVerizon-Headwater; HLVerizon Headwater
Subject: Re: Headwater v. Verizon (23-cv-352) (E.D. Tex.) - Correspondence

[WARNING: External Email]

Counsel,

Following up on the meet and confer from yesterday, we disagree with Verizon and T-Mobile's positions that Headwater's infringement contentions are deficient. And while Headwater does not believe that any further detail is necessary to put defendants on notice of Verizon and T-Mobile's infringement of the Asserted Patents, and in an effort to avoid unnecessary motion practice, Headwater will provide further amendments by noon PT on August 6th.

We also discussed Verizon and T-Mobile's ongoing failure to meet its obligations under Local Patent Rule 3-4 as well as the Discovery Orders entered in the respective cases and which Headwater has addressed in written correspondence and on various meet and confers since discovery opened. We understand that Verizon and T-Mobile continue to refuse to produce documents in accordance with the Local Patent Rules and the Discovery Orders. As discussed, Headwater thus intends to move to compel production of these documents.

Regards,

Jason Wietholter

Russ, August & Kabat

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On Jul 31, 2024, at 9:29 PM, Sim, Charlie <CSim@gibsondunn.com> wrote:

Hi Jason,

Let's do 1:00 PM / 4:00 ET tomorrow. I'll send around a Zoom link in a moment.

Thanks,
Charlie

Charlie Sim
Associate Attorney

T: +1 212.351.6274 | M: +1 607.339.1652
CSim@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue, New York, NY 10166-0193

From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Wednesday, July 31, 2024 4:03 PM
To: Sim, Charlie <CSim@gibsondunn.com>
Cc: Isaacs, Cameron Fredriksen <CSaacs@gibsondunn.com>; Marc Fenster <mfenster@raklaw.com>;
Kristopher Davis <kdavis@raklaw.com>; headwater@raklaw.com; *** GDCVerizon-Headwater
<GDCVerizon-Headwater@gibsondunn.com>; HLVerizon Headwater
<HLVerizonHeadwater@hoganlovells.com>
Subject: Re: Headwater v. Verizon (23-cv-352) (E.D. Tex.) - Correspondence

[WARNING: External Email]

Counsel,

Headwater can be available Thursday, August 1 during 1-2 PM PT, or else on Friday, August 2 during 2:30-4:00 PM PT.

Please let us know which of those slots work for you and please send around a dial-in/meeting invite.

Thanks,

Jason Wietholter

Russ, August & Kabat

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On Jul 31, 2024, at 7:43 AM, Sim, Charlie <CSim@gibsondunn.com> wrote:

Counsel,

Following up on our request below, please provide your availability for a lead-and-local conference this week to discuss the issues raised in our June 12 letter.

Best,
Charlie

Charlie Sim
Associate Attorney

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CSim@gibsondunn.com

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From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Tuesday, July 23, 2024 6:49 AM
To: Sim, Charlie <CSim@gibsondunn.com>
Cc: Isaacs, Cameron Fredriksen <CIsaacs@gibsondunn.com>; Marc Fenster <mfenster@raklaw.com>; Kristopher Davis <kdavis@raklaw.com>; headwater@raklaw.com; *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>; HLVerizon Headwater <HLVerizonHeadwater@hoganlovells.com>
Subject: Re: Headwater v. Verizon (23-cv-352) (E.D. Tex.) - Correspondence

[WARNING: External Email]

Hi Charlie,

Our lead counsel is in trial this week. We can be available to meet and confer tomorrow without lead counsel between 9AM-12PM ET. What availability do you have during that window?

Thanks,
Jason Wietholter
Russ, August & Kabat

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On Jul 22, 2024, at 11:38 AM, Sim, Charlie
<CSim@gibsondunn.com> wrote:

Counsel,

Following up, we are available tomorrow after 4pm ET for a
lead and local conference. Please confirm whether
Headwater is available during that time.

Thanks,
Charlie

Charlie Sim
Associate Attorney

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CSim@gibsondunn.com

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From: Sim, Charlie <CSim@gibsondunn.com>
Sent: Sunday, July 21, 2024 6:52 PM
To: Jason Wietholter <jwietholter@raklaw.com>
Cc: Isaacs, Cameron Fredriksen <CIsaacs@gibsondunn.com>; Marc Fenster <mfenster@raklaw.com>; Kristopher Davis <kdavis@raklaw.com>; headwater@raklaw.com; *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>; HLVerizon Headwater <HLVerizonHeadwater@hoganlovells.com>
Subject: Re: Headwater v. Verizon (23-cv-352) (E.D. Tex.) - Correspondence

Counsel,

We are not available to confer on Monday due to a hearing. We request a lead and local conference, and are investigating our availability later this week.

Please propose some additional times this week (after Monday) when Headwater's lead and local counsel are available.

Thanks,
Charlie

Charlie Sim

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On Jul 19, 2024, at 12:10 PM, Jason Wietholter
<jwietholter@raklaw.com> wrote:

[WARNING: External Email]

Hi Charlie,

We disagree with the characterizations in Verizon's letter. We can be available to meet and confer on Monday at 8:00AM PT or 9:00AM PT.

Regards,

Jason Wietholter

Russ, August & Kabat

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90025

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On Jul 2, 2024, at 10:43 AM, Sim, Charlie
<CSim@gibsondunn.com> wrote:

Counsel,

Following up on the below correspondence. We have not heard back from you on our request for a lead and local conference on the many deficiencies in Headwater's infringement

contentions. Please provide your availability to confer.

Best,
Charlie

Charlie Sim
[Associate Attorney](#)

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CSim@gibsondunn.com

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From: Isaacs, Cameron Fredriksen
<CIsaacs@gibsondunn.com>
Sent: Wednesday, June 12, 2024 9:39 AM
To: Jason Wietholter <jwietholter@raklaw.com>; Marc Fenster <mfenster@raklaw.com>; Kristopher Davis <kdavis@raklaw.com>; headwater@raklaw.com
Cc: *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>; HLVerizon Headwater <HLVerizonHeadwater@hoganlovells.com>
Subject: Headwater v. Verizon (23-cv-352) (E.D. Tex.) - Correspondence

Counsel,

Please see the attached correspondence.

Regards,

Cameron

Cameron Fredriksen Isaacs
[Paralegal](#)

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